

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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HITLER CALLE,

Plaintiff,

-against-

PIZZA PALACE CAFÉ LLC (d/b/a PIZZA PALACE),
SASHA ISHAQOV, YURI ISHAQOV, and VLADY
DJOURAEV,

Defendants.

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Pursuant to Rules 60(b)(5) and 60(b)(6) of the Federal Rules of Civil Procedure, Plaintiff Hitler Calle (“Plaintiff” or “Calle”) and Defendants Sasha Ishaqov a/k/a Alexander Ishakov, Yuri Ishaqov, and Vlady DjouraeV (collectively hereinafter the “Individual Defendants”), by and through their respective counsel, hereby stipulate as follows:

1. The Individual Defendants, having averred that they were never properly served with the complaint in this case, it is

HEREBY STIPULATED AND AGREED, that the default judgment entered on January 31, 2022, and any judgment enforcement efforts, including those affecting Sasha Ishaqov a/k/a Alexander Ishakov and his wife Tatiana Ishakova, is and are vacated as to the Individual Defendants; and it is

HEREBY FURTHER STIPULATED AND AGREED, that the Individual Defendants have agreed to accept service of process of the complaint in this case via email by and through counsel and hereby waive any defenses related to the service of process; and it is

Case No.: 1:20-cv-4178 (LDH) (LB)

**STIPULATION OF VACATUR OF
DEFAULT JUDGMENT**

HEREBY FURTHER STIPULATED AND AGREED, that the Plaintiff and the Individual Defendants jointly and respectfully seek a mediation referral Order pursuant to Local Civil Rule 83.8; and it is

HEREBY FURTHER STIPULATED AND AGREED, that the Individual Defendants' deadline to respond to the complaint is extended to January 20, 2024.

Dated: New York, New York
November 21, 2023

Dated: Lake Success, New York
November 20, 2023

CSM LEGAL, P.C.

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